

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**SECOND AMENDED VERIFIED STATEMENT OF STEVENS & LEE, P.C.  
PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Federal Rule of Bankruptcy Procedure 2019, Stevens & Lee, P.C. (“S&L”) makes the following representations on its own behalf and on behalf of the lawyers and law firms identified below with whom S&L is associated in these bankruptcy cases (“Co-counsel”):

1. S&L and its Co-counsel represent the following persons in their respective individual and putative capacities as proposed representatives of classes of privately insured parties who are plaintiffs and proposed class representatives in their individual and representative capacities in suits brought against Debtor-Defendant Purdue Pharma Inc. (together with its affiliate Debtors, “Purdue”) and other affiliated and non-affiliated defendants, as set forth below (and with the class members, collectively, the “Class Claimants”) in their 25 respective actions in the 25 states

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<sup>1</sup>The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrum Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF L.P. (0495), SVC Pharma L.P. (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

identified below (the “Class Actions”), all of which have been and remain stayed in connection with *In re National Prescription Opiate Litigation*, No. 1:17-md-2804 (N.D. Ohio) (the “MDL”):

Ronald D. Stracener, F. Kirk Hopkins, Jordan Chu, Amel Eiland, Nadja Streiter, Michael Konig, Eli Medina, Barbara Rivers, Marketing Services of Indiana, Inc., Glenn Golden, Gretta Golden, Michael Christy, Edward Grace, Debra Dawsey, Darcy Sherman, Kimberly Brand, Lou Sardella, Michael Kłodzinski, Kevin Wilk, Heather Enders, Jason Reynolds, MSI Corporation, Deborah Green-Kuchta, W. Andrew Fox, Dora Lawrence, Michael Lopez, and Zachary R. Schneider.

2. Plaintiff Ronald D. Stracener seeks to hold Purdue accountable for the economic harm it has imposed on Alabama purchasers of private health insurance, in the action *Stracener v. Purdue Pharma, L.P., et. al.*, No. 19-cv-86 (S.D. Ala.).

3. Plaintiff F. Kirk Hopkins seeks to hold Purdue accountable for the economic harm it has imposed on Arizona purchasers of private health insurance, in the action *Hopkins v. Purdue Pharma, L.P., et. al.*, No. 18-cv-2646 (D. Ariz.).

4. Plaintiff Jordan Chu seeks to hold Purdue accountable for the economic harm it has imposed on California purchasers of private health insurance, in the action *Chu v. Purdue Pharma, L.P., et. al.*, No. 18-cv-2576 (N.D. Cal.).

5. Plaintiff Amel Eiland seeks to hold Purdue accountable for the economic harm it has imposed on Colorado purchasers of private health insurance, in the action *Eiland v. Purdue Pharma, L.P., et. al.*, No. 18-cv-46283 (D. Colo.).

6. Plaintiff Nadja Streiter seeks to hold Purdue accountable for the economic harm it has imposed on Connecticut purchasers of private health insurance, in the action *Streiter v. Purdue Pharma, L.P., et. al.*, No. 18-cv-1425 (D. Conn.).

7. Plaintiff Michael Konig seeks to hold Purdue accountable for the economic harm it has imposed on Florida purchasers of private health insurance, in the action *Konig v. Purdue Pharma, L.P., et. al.*, No. 18-cv-61960 (S.D. Fla.).

8. Plaintiff Eli Medina seeks to hold Purdue accountable for the economic harm it has imposed on Idaho purchasers of private health insurance, in the action *Medina v. Purdue Pharma, L.P., et. al.*, No. 18-cv-369 (D. Idaho).

9. Plaintiff Barbara Rivers seeks to hold Purdue accountable for the economic harm it has imposed on Illinois purchasers of private health insurance, in the action *Rivers v. Purdue Pharma, L.P., et. al.*, No. 18-cv-3116 (N.D. Ill.).

10. Plaintiff Marketing Services of Indiana, Inc. seeks to hold Purdue accountable for the economic harm it has imposed on Indiana purchasers of private health insurance, in the action *Marketing Services of Indiana, Inc. v. Purdue Pharma, L.P., et. al.*, No. 18-cv-2778 (S.D. Ind.).

11. Plaintiffs Glenn Golden, Gretta Golden and Michael Christy seek to hold Purdue accountable for the economic harm it has imposed on Louisiana purchasers of private health insurance, in the action *Golden et. al. v. Purdue Pharma, L.P., et. al.*, No. 19-cv-1048 (E.D. La.).

12. Plaintiff Edward Grace seeks to hold Purdue accountable for the economic harm it has imposed on Massachusetts purchasers of private health insurance, in the action *Grace v. Purdue Pharma, L.P., et. al.*, No. 18-cv-10857 (D. Mass.).

13. Plaintiff Deborah Dawsey seeks to hold Purdue accountable for the economic harm it has imposed on Michigan purchasers of private health insurance, in the action *Dawsey v. Purdue Pharma, L.P., et. al.*, No. 19-cv-94 (W.D. Mich.).

14. Plaintiff Darcy Sherman seeks to hold Purdue accountable for the economic harm it has imposed on Minnesota purchasers of private health insurance, in the action *Sherman v. Purdue Pharma, L.P., et. al.*, No. 18-cv-3335 (D. Minn.).

15. Plaintiff Kimberly Brand seeks to hold Purdue accountable for the economic harm it has imposed on Missouri purchasers of private health insurance, in the action *Brand v. Purdue Pharma, L.P., et. al.*, No. 18-cv-653 (W.D. Mo.).

16. Plaintiff Lou Sardella seeks to hold Purdue accountable for the economic harm it has imposed on New Jersey purchasers of private health insurance, in the action *Sardella v. Purdue Pharma, L.P., et. al.*, No. 18-cv-8706 (D.N.J.).

17. Plaintiff Michael Kłodzinski seeks to hold Purdue accountable for the economic harm it has imposed on New York purchasers of private health insurance, in the action *Kłodzinski v. Purdue Pharma, L.P., et. al.*, No. 18-cv-3927 (S.D.N.Y.).

18. Plaintiff Kevin Wilk seeks to hold Purdue accountable for the economic harm it has imposed on North Carolina purchasers of private health insurance, in the action *Wilk v. Purdue Pharma, L.P., et. al.*, No. 18-cv-181 (E.D.N.C.).

19. Plaintiff Heather Enders seeks to hold Purdue accountable for the economic harm it has imposed on Ohio purchasers of private health insurance, in the action *Enders v. Purdue Pharma, L.P., et. al.*, No. 19-cv-448 (S.D. Ohio).

20. Plaintiff Jason Reynolds seeks to hold Purdue accountable for the economic harm it has imposed on Oregon purchasers of private health insurance, in the action *Reynolds v. Purdue Pharma, L.P., et. al.*, No. 18-cv-1911 (D. Or.).

21. Plaintiff MSI Corporation seeks to hold Purdue accountable for the economic harm it has imposed on Pennsylvania purchasers of private health insurance, in the action *MSI Corp. v. Purdue Pharma, L.P., et. al.*, No. 18-cv-1109 (W.D. Pa.).

22. Plaintiff Deborah Green-Kuchta seeks to hold Purdue accountable for the economic harm it has imposed on South Dakota purchasers of private health insurance, in the action *Green-Kuchta v. Purdue Pharma, L.P., et. al.*, No. 18-cv-4132 (D.S.D.).

23. Plaintiff W. Andrew Fox seeks to hold Purdue accountable for the economic harm it has imposed on Tennessee purchasers of private health insurance, in the action *Fox v. Purdue Pharma, L.P., et. al.*, No. 18-cv-194 (E.D. Tenn.).

24. Plaintiff Dora Lawrence seeks to hold Purdue accountable for the economic harm it has imposed on Texas purchasers of private health insurance, in the action *Lawrence v. Purdue Pharma, L.P., et. al.*, No. 18-cv-2889 (S.D. Tex.).

25. Plaintiff Michael Lopez seeks to hold Purdue accountable for the economic harm it has imposed on Utah purchasers of private health insurance, in the action *Lopez v. Purdue Pharma, L.P., et. al.*, No. 18-cv-719 (D. Utah).

26. Plaintiff Zachary R. Schneider seeks to hold Purdue accountable for the economic harm it has imposed on Wisconsin purchasers of private health insurance, in the action *Schneider v. Purdue Pharma, L.P., et. al.*, No. 19-cv-611 (E.D. Wis.).

27. S&L and its Co-counsel also represent the following persons in their respective individual and putative capacities as proposed representatives of classes of privately insured parties who are plaintiffs and proposed class representatives in their individual and representative capacities in suits originally brought against Purdue and other affiliated and non-affiliated defendants, as set forth below in their three (3) respective actions in the three (3) states identified below, all of which have been and remain stayed in connection with the MDL, the automatic stay and Order Pursuant To 11 U.S.C. § 105(a) Granting, In Part, Motion For A Preliminary Injunction (Adv. Pro. Docket No. 82), entered in the Adversary Proceeding styled *Purdue Pharma L.P., et al. v. Commonwealth of Massachusetts, et al., Adv. Pro. No. 19-08289*.<sup>2</sup>

28. Plaintiff William Taylor seeks to eventually hold Purdue accountable for the economic harm it has imposed on Kansas purchasers of private health insurance, in the action *Taylor v. Purdue Pharma, L.P., et. al.*, No. 19-cv-02596 (D. Kansas).

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<sup>2</sup> By agreement with Debtors' counsel, amended complaints that do not name the Purdue Debtors will be filed in these class actions.

29. Plaintiff William Stock seeks to eventually hold Purdue accountable for the economic harm it has imposed on Oklahoma purchasers of private health insurance, in the action *Stock v. Purdue Pharma, L.P., et. al.*, No. 19-cv-00526 (N.D. Okla.).

30. Plaintiff Al Marino, Inc. seeks to eventually hold Purdue accountable for the economic harm it has imposed on West Virginia purchasers of private health insurance, in the action *Al Marino, Inc. v. Purdue Pharma, L.P., et. al.*, No. 19-cv-00723 (S.D. West Va.).

31. S&L and its Co-counsel also represent Eric Hestrup; Dr. Hestrup is the lead class claimant in a nationwide class action complaint in the United States District Court for the Northern District of Illinois, *Hestrup v. Mallinckrodt PLC, et al.*, Case No. 19-cv-08453 (“*Hestrup Complaint*”). As explained in paragraph 41 of the *Hestrup Complaint*, Purdue was not named as a defendant therein because of the automatic stay and the injunctive relief granted by the Bankruptcy Court. The *Hestrup Complaint* was subsequently transferred to the MDL and all proceedings in connection therewith are currently stayed.

32. None of these plaintiffs has any “disclosable economic interest” other than as disclosed in the preceding paragraphs.

33. Other than as disclosed herein, S&L does not currently represent or claim to represent any other entity with respect to the Debtors’ cases, and does not hold any claim against or interest in the Debtors or their estates.

34. Certain of the Co-counsel do represent other entities in actions also currently stayed in connection with the MDL. They and the parties they represent are identified in the attached Exhibit A.

35. The undersigned hereby certifies that this amended verified statement is true and accurate to the best of his knowledge, information and belief, and subject to the penalties for perjury provided for in 28 U.S.C. § 1746. S&L reserves its right to further revise, amend and/or

supplement this amended verified statement as may be necessary or appropriate. This statement is provided without prejudice to the right of S&L and its clients to file any further statements, claims, adversary complaints, documents, notices or pleadings in these chapter 11 cases.

Dated: May 26, 2020

Respectfully submitted,

/s/ Nicholas F. Kajon

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on May 26, 2020, he caused a true copy of the foregoing *SECOND AMENDED VERIFIED STATEMENT OF STEVENS & LEE, P.C. PURSUANT TO BANKRUPTCY RULE 2019* to be served electronically upon all parties in interest through the Court's CM/ECF System and pursuant to the Order Establishing Certain Notice, Case Management, and Administrative Procedures.

/s/ *Nicholas F. Kajon*

Nicholas F. Kajon

Exhibit A

**Co-counsel Actions**

Morgan & Morgan has filed the following action:

*Hestrup v. Mallinckrodt PLC, et al.*, Case No. 19-cv-08453 (United States District Court for the Northern District of Illinois)<sup>3</sup>

Martin v. Purdue Therapeutics, Inc., CV 2018-013354 (Maricopa County).

Morgan & Morgan has filed actions against either or both Purdue Pharma, Inc. and Purdue Therapeutics, Inc. on behalf of the following:

**Oklahoma**

The County Commission of Mayes County  
The County Commission of Rogers County  
The County Commission of Nowata County  
The County Commission of Creek County  
The County Commission of Washington County  
The County Commission of Okmulgee County

**Kansas:**

The County Commission of Crawford County  
The County Commission of Neosho County

**West Virginia:**

Town of Kermit  
City of Welch  
Town of West Hamlin  
McDowell County  
Clay County  
Lincoln County  
Mercer County  
Town of Chapmanville  
Mingo County  
Town of Chapmanville  
Town of Hamlin  
City of Williamson  
Town of Gilbert:

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<sup>3</sup> Purdue was not named as a defendant therein because of the automatic stay and the injunctive relief granted by the Bankruptcy Court. The *Hestrup* Complaint was subsequently transferred to the MDL and all proceedings in connection therewith are currently stayed.

**Missouri:**

City of Springfield

**Florida:**

City of Deerfield Beach  
City of Hallandale Beach  
City of Pembroke Pines  
City of Miramar  
City of Lauderhill  
City of Ft. Lauderdale  
Monroe County